

**THE LAW  
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June 9, 2024

**VIA ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 701  
New York, New York 10007

**Re: United States v. Michael Shvartsman, et. al., No. 23 Cr. 307 (LJL)**

Dear Judge Liman:

On behalf of Michael Shvartsman, defendant in the above-referenced case, I write to request that the Court modify the travel restrictions imposed on the defendant as a condition of his bail, as indicated below. I have communicated in writing with Assistant United States Attorney Elizabeth Hanft, and Ms. Hanft advised that the Government does not have an objection to this application.

My client requests to travel to Buffalo, NY to attend to business interests he has in that city as well as consult with counsel located there on June 10, 2024, through June 12, 2024. We have committed to provide the U.S. Attorney's office and pretrial services detailed travel plans.

As I have noted above, AUSA Hanft has no objection to this application, and if the Court is inclined to grant it, we request it do so by endorsing this letter with an endorsement above.

Very truly yours,

Grant J. Smith  
Counsel to Michael Shvartsman

cc: All counsel of record via ECF